

1 **TIFFANY & BOSCO, P.A.**

2 Ace C. Van Patten, Esq.

3 Nevada Bar No. 11731

4 Krista J. Nielson, Esq.

5 Nevada Bar No. 10698

6 10100 W. Charleston Boulevard, Suite 220

7 Las Vegas, NV 89135

8 Telephone: 702 258-8200

9 Fax: 702 258-8787

10 [nybk@tblaw.com](mailto:nybk@tblaw.com)

11 TB File No. 20-71093

12 Attorneys for *Secured Creditor* Selene Finance LP

13 **UNITED STATES BANKRUPTCY COURT**

14 **DISTRICT OF NEVADA**

15 IN RE:

16 CENSO LLC.,

17 Debtor.

18 Case No. 19-16636-mkn

19 Chapter 11

20 **STIPULATION RESOLVING MOTION TO  
21 VALUE COLLATERAL AND MODIFY  
22 RIGHTS OF SELENE FINANCE LP  
23 PURSUANT TO 11 U.S.C §506(a), §1111,  
24 AND §1123 (1161 DANA MAPLE COURT,  
25 LAS VEGAS, NV 89123) AND VACATING  
26 HEARING**

27 **STIPULATION RESOLVING MOTION TO VALUE COLLATERAL AND MODIFY RIGHTS  
28 OF SELENE FINANCE LP PURSUANT TO 11 U.S.C §506(A), §1111, AND §1123 (1161 DANA  
29 MAPLE COURT, LAS VEGAS, NV 89123) AND VACATING HEARING**

30 COMES NOW the Debtor, Censo LLC. ("Debtor") and Creditor, Selene Finance LP ("Creditor"),  
31 by and through their undersigned counsels of record, and enter into that certain stipulation as follows:

32 WHEREAS on July 15, 2020 Debtor filed a Motion to Value Collateral and Modify Rights of  
33 Selene Finance LP Pursuant to 11 U.S.C §506(a), §1111, and §1123 (1161 Dana Maple Court, Las Vegas,  
34 NV 89123) (the "Motion to Value") (Docket Entry No. 61) seeking to value the property located at 1161  
35 Dana Maple Court, Las Vegas, NV 89123 at \$280,000.00 based on an appraisal dated January 2, 2019; and

36 WHEREAS the parties have agreed to resolve the pending to Motion to Value;

1 IT IS THEREFORE HEREBY STIPULATED as follows:

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

1. The value of the property as of the date of this Stipulation is \$280,000.00;
2. This Stipulation does not constitute an agreement to any specific treatment regarding the underlying debt based on the above-referenced valuation;
3. Creditor does not waive any rights it may have to obtain an updated valuation of the property at the time of Confirmation;
4. Creditor does not waive any rights it has to argue that the loan cannot be modified by the Debtor;
5. Creditor does not waive any rights it may have to object to any Chapter 11 Plan of Reorganization on any grounds, including that the Plan does not provide for full payment of the entire underlying debt, or for Creditor to make an election under 11 U.S.C. §1111(b); and
6. The continued hearing on the Motion to Value scheduled for March 17, 2021 at 9:30 a.m. shall be vacated upon entry of the Order approving the instant Stipulation.

13 **IT IS SO STIPULATED.**

15 By /s/ Ace C. Van Patten, Esq.

16 Ace C. Van Patten, Esq.

17 Attorney for Creditor

18 By Corey B. Beck

19 Corey B. Beck, Esq.

20 Attorney for Debtor

21 *Delia Dktr* *approval of Stipulation on Value*  
22 *3. 4. 2021* *for CENSO LLC*